

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION**

**IN RE: BLUE CROSS BLUE SHIELD
ANTITRUST LITIGATION
MDL 2406**

: : **Master File No. 2:13-cv-20000-RDP**
: :
: :
: : **This document relates to**
: : **Subscriber Track cases**

**DECLARATION OF JENNIFER M. KEOUGH
REGARDING SUPPLEMENTAL NOTICE TO SELF-FUNDED ACCOUNTS**

I, JENNIFER M. KEOUGH, declare as follows:

1. I am Chief Executive Officer (“CEO”) of JND Legal Administration LLC (“JND”).

JND has extensive experience with all aspects of legal administration and has administered settlements in hundreds of class action cases.

2. JND was appointed as the Notice and Claims Administrator¹ in the above captioned litigation for the purposes of administering the Settlement Agreement, dated October 30, 2020 (ECF No. 2610-2), which was approved preliminarily by the Court in its Memorandum Opinion and Order Preliminarily Approving Settlement, Plan of Distribution, and Notice Plan, and Directing Notice to the Class, dated November 30, 2020 (“Preliminary Approval Order” or “Notice Order”). ECF No. 2641. Under my direction, JND effectuated the Court-approved Notice Plan, as outlined in my Declaration Regarding Notice Plan and Settlement Administration (ECF No. 2812-2), and the Subscriber Plaintiffs moved for final approval of the Settlement (ECF No. 2812).

¹ Unless otherwise noted, capitalized terms have the same meaning as in the Settlement Agreement.

3. I was advised that during the Final Fairness Hearing, the Settling Parties and the Court agreed that the Second Blue Bid relief provided to certain Self-Funded Accounts is properly construed as Rule 23(b)(3) relief. The notice first disseminated to the Settlement Classes in March 2021 did not explicitly state that Self-Funded Entity Accounts (accounts, employer, health benefit plans, ERISA plan, non-ERISA plans, or groups, but not sponsors, administrators, fiduciaries, and Members thereof) (“Self-Funded Entity Accounts”) that opt out of the Rule 23(b)(3) Damages Class retain the right to seek individualized injunctive relief in their subsequent litigation. As a result, JND has been asked to issue supplemental notice to Self-Funded Entity Accounts to make explicit that if they choose to opt out of the Settlement Damages Class they will not receive any individualized injunctive relief under the Settlement (i.e., Opt Outs cannot qualify under the Settlement for the right to request a Second Blue Bid), but they can seek individualized injunctive relief (which might include a Second Blue bid or other individualized injunctive relief depending on the circumstances surrounding the Self-Funded Entity Account’s claim) in their own lawsuit. In addition, JND has also been asked to inform Self-Funded Entity Accounts that they may object to the Supplemental Notice and/or the Supplemental Notice Plan if they do not exclude themselves from the Settlement Damages Class.

4. This Declaration outlines the proposed Supplemental Notice Plan to the Self-Funded Entity Accounts. It is based on my personal knowledge, as well as upon information provided to me from Counsel for the Parties and by experienced JND employees, and if called upon to do so, I could and would testify competently thereto.

I. NOTICE PLAN SUMMARY

5. The proposed Supplemental Notice Plan to the Self-Funded Entity Accounts, attached as **Exhibit A**, includes direct mail and email notice, a broad-reaching digital media

campaign tailored to business entities, and media placements in industry e-newsletters, as well as an internet search effort.

6. **Direct Individual Notice.** JND will cause the Supplemental Entity Postcard Notice, attached as **Exhibit B**, to be mailed to all Self-Funded Entity Accounts for which Settling Defendants have provided contact records to JND and which Settling Defendants have identified as Self-Funded Entity Accounts (estimated to be approximately 195,000 entities). In addition, JND will cause the Supplemental Entity Email Notice, attached as **Exhibit C**, to be sent to those for which an email address is provided.

7. **Digital Notice.** JND will employ a digital effort targeting individuals who would be responsible for the Self-Funded Entity Accounts. These individuals include senior level Human Resources employees and business owners and partners of the Self-Funded Account Entities.

8. The supplemental digital effort includes 450,000 digital impressions being served through LinkedIn, the leading professional social media platform, and 500,000 digital impressions being served through leading business websites, such as Yahoo Business; CNBC.com; FastCompany.com; Forbes.com; Bloomberg.com; Entrepreneur.com, WSJ.com, BusinessInsider.com and AllBusiness.com, for a total of 950,000 digital impressions.

9. JND will also cause digital notices to be placed through leading healthcare and employee benefits e-newsletters, such as SHRM HR Weekly E-Newsletter; HREBenefits E-Newsletter; and Employee Benefit News E-Newsletter.² JND estimates a total of ten E-Newsletter notices will be placements, delivering approximately 1.3 million sends.

10. Samples of the Supplemental Entity Digital Ads are attached as **Exhibit D**.

² Industry media is limited in terms of availability. Publishers also have a right of refusal when it comes to ad placements. If industry media is unavailable or they do not accept our ad at the time of placement, JND will seek comparable alternatives.

11. **Internet Search Notice.** JND will also implement a digital search effort. Web browsers frequently default to a search engine page, making search engines a common source to get to a specific website (i.e., as opposed to typing the desired URL in the navigation bar). When purchased keywords related to the Settlement, particularly keywords included in the Supplemental Notices, are searched, a paid ad with a hyperlink to the Settlement website may appear on the search engine results page. A sample of the Supplemental Internet Search Ad is included in **Exhibit D.**

II. **CONCLUSION**

12. In my opinion, the Supplemental Notice Plan as described herein provides the best notice practicable. It is designed to and will reach as many Self-Funded Entity Accounts as practicable and provide them with the opportunity to learn more about their opt out and objection rights.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on January 10, 2022, in Seattle, Washington.



JENNIFER M. KEOUGH

- EXHIBIT A -



December 22, 2021

Blue Cross Blue Shield Settlement ASO ENTITY SUPPLEMENTAL NOTICE

OBJECTIVE

The objective of the ASO Entity Supplemental Notice is to notify ASO Entity Class Members pursuant to court order.

SUPPLEMENTAL EFFORT STRATEGIES

Based on our analysis of the Notice Plan that ran from April 1, 2021 through May 30, 2021 (“Initial Notice Plan”) and the Reminder Effort that ran from September 7, 2021 through October 29, 2021 (“Reminder Effort”), we designed a supplemental notice campaign. The proposed supplemental notice effort includes direct email and mailed notice to approximately 195K ASO entities identified in Settling Defendants’ data; a broad-reaching digital media campaign targeting business entities through an approved list of financial business sites, as well as the leading professional social media platform (*LinkedIn*); notice placements in industry e-Newsletters (*SHRM HR Weekly*, *HRE Benefits*, and *Employee Benefit News*); and an internet search effort.



DIRECT NOTICE EFFORT	DETAILS
 	<ul style="list-style-type: none"> Send an email and mail notice to approximately 195K ASO entities identified in Settling Defendants' data

ENTITY DIGITAL EFFORT	DETAILS
        	<ul style="list-style-type: none"> Ads will be placed on leading business websites, e.g.: <ul style="list-style-type: none"> ○ Yahoo Business ○ CNBC.com ○ FastCompany.com ○ Forbes.com ○ Bloomberg.com ○ Entrepreneur.com ○ WJS.com ○ BusinessInsider.com ○ AllBusiness.com Banner ads serving 500,000 digital impressions
	<ul style="list-style-type: none"> Leading professional social network platform Targeting two key professional groups – HR employees and executive staff Target #1: <ul style="list-style-type: none"> ○ <u>Job Seniority</u>: Senior, Manager, Director, VP ○ <u>Member Skills</u>: HR Consulting ○ <u>Member Groups</u>: HR Specialist, HR Professionals, Employee Benefits & HR, Employee Health & Wellness, Insurance ○ <u>Company Industries</u>: Human Resources ○ <u>Job Functions</u>: Human Resources Target #2: CEO, Owner, and Partners Ads will be placed on the right-hand side or top of the desktop feed Text ads serving 450,000 digital impressions
TOTAL	950,000 digital impressions



ENTITY E-NEWLSETTERS ¹	DETAILS
 SHRM [®] SOCIETY FOR HUMAN RESOURCE MANAGEMENT	<u>SHRM HR Weekly E-Newsletter</u> <ul style="list-style-type: none"> • Largest human resources organization • 275K+ members worldwide • Dedicated to the needs of HR professionals • Provides information on benefits, compensation, employee and labor relations and other HR policies • Issued Mondays • 2 digital placements • Estimated 430K sends each; 860K total sends
	<u>HRE Benefits E-Newsletter</u> <ul style="list-style-type: none"> • Provides key decision-makers with news, profiles of HR visionaries and success stories of human resource innovators • Issued Tuesdays • 2 digital placements • Estimated 100K sends each; 200K total sends
	<u>Employee Benefit News E-Newsletter</u> <ul style="list-style-type: none"> • Primary media resource that benefit professionals rely on to navigate the complexities of employee benefit planning and delivery • Serves senior-level benefits decision-makers, including HR executives and benefits Directors whose responsibility includes health plans • Issued Mondays, Tuesdays and Thursdays • 6 digital placements • Estimated 30K- 45K sends each; 240K total sends
TOTAL	10 e-newsletter placements, 1.3 million sends

SEARCH EFFORT	DETAILS
	<ul style="list-style-type: none"> • Web browsers frequently default to a search engine page, making search engines a common source to get to a specific website (i.e., as opposed to typing the desired URL in the navigation bar) • When purchased keywords related to this Settlement are searched, a paid search ad with a hyperlink to the case website may appear on the search engine results page • Efforts will be monitored and optimized

¹ Industry media is limited in terms of availability. Publishers also have a right of refusal when it comes to ad placements. If industry media is unavailable or they do not accept our ad at the time of placement, JND will seek comparable alternatives.

- EXHIBIT B -



Additional Information for Self-Funded Entity Accounts affected by the **\$2.67 billion Blue Cross Blue Shield Settlement**

Para una notificación en español,
visite www.BCBSsettlement.com/espanol /

Questions? Call (888) 681-1142 or
Visit www.BCBSsettlement.com

Blue Cross Blue Shield Settlement
c/o JND Legal Administration
P.O. BOX 91390
Seattle, WA 98111

Self-Funded Entity Class Member Name
Self-Funded Entity Class Member Address
Self-Funded Entity Class Member City/State/Zip

A federal court authorized that this SUPPLEMENTAL NOTICE be sent to you. Class Representatives ("Plaintiffs") and the Blue Cross Blue Shield Association ("BCBSA") and Settling Individual Blue Plans (together with BCBSA, "Settling Defendants") reached a settlement in a class action antitrust lawsuit called In re: Blue Cross Blue Shield Antitrust Litigation MDL 2406, N.D. Ala. Master File No. 2:13-cv-20000-RDP (the "Settlement").

This SUPPLEMENTAL NOTICE is to inform you that Blue Cross and/or Blue Shield Self-Funded Entity Accounts that choose to opt out of the Settlement Damages Class will not receive any individualized injunctive relief under the Settlement (i.e., Opt Outs cannot qualify under the Settlement for the right to request a Second Blue Bid), but can seek individualized injunctive relief in their own lawsuit.

This Notice advises you that Self-Funded Entity Accounts have until **Month x, 2022 to opt out** from the Settlement Damages Class. Opting out means that you will not be able to receive monetary damages or individualized injunctive relief under the Settlement. If you opt out and previously filed a claim, your claim will be automatically withdrawn. If you opt out, you will maintain your right to sue or continue to sue Settling Defendants for monetary damages and individualized injunctive relief related to the claims in this case.

Who is affected?

You may be affected if you are a Self-Funded Entity Account that purchased or were enrolled in a Blue Cross or Blue Shield administrative services plan at any point between September 1, 2015 and October 16, 2020. Self-Funded Entity Accounts encompass any account, employer, health benefit plan, ERISA plan, non-ERISA plan, or group that purchased, were covered by, participated in, or were enrolled in a Self-Funded Health Benefit Plan from September 1, 2015 through October 16, 2020.

Self-Funded Entity Accounts **do not** include sponsors, administrators, fiduciaries, or members of a Self-Funded Account.

What are my options?

Stay in the Settlement Classes: If you stay in the Settlement Classes, you will be bound by the Settlement. The deadline to file a claim has already passed. If you already filed a valid and timely claim, you may receive a cash benefit. You may also check your eligibility to request a Second Blue Bid at [search field].

Opt Out or Exclude Yourself: If you opt out or exclude yourself from the Settlement Damages Class, you will not receive any monetary damages or individualized injunctive relief, including the right to request a Second Blue Bid, under the Settlement. You will keep your right to sue Settling Defendants for monetary damages and individualized injunctive relief related to the claims in this case. As a member of the Rule 23(b)(2) Injunctive Relief Class, you will still release all other claims for declaratory or indivisible injunctive relief that are released under the Settlement Agreement. If you opt out and you previously filed a claim, your claim will automatically be withdrawn. If you previously opted out and you want to now remain in the Settlement Damages Class, you must withdraw your opt out request.

To learn how to object, opt out, or withdraw your opt out request go to www.BCBSSettlement.com. You must mail or email your objection, opt out request, or your request to withdraw your opt out so that it is postmarked or received by Month x, 202x.

Object to Supplemental Notice and/or Supplemental Notice Plan: If you do not exclude yourself from the Settlement Damages Class, you may object to this Supplemental Notice and/or the Supplemental Notice Plan filed with the Court. Given all Class Members' prior opportunity to object, no other objections are permitted at this time.

— Please Do Not Contact The Court Regarding This Notice. —

QUESTIONS? Visit www.BCBSSettlement.com, email info@BCBSsettlement.com, call (888) 681-1142, or write *Blue Cross Blue Shield Settlement c/o JND Legal Administration, P.O. Box 91390, Seattle, WA 98111*.



Name: _____

Current Address: _____

Place
Stamp
Here

Address Change Form

To make sure your information remains up-to-date in our records,
please confirm your address by filling in the above information
and depositing this postcard in the U.S. Mail.

JND Legal Administration
Attn: Blue Cross Blue Shield Settlement
P.O. BOX 91390
Seattle, WA 98111

- EXHIBIT C -

To: [Self-Funded Entity Account Class Member Email Address]
From: Blue Cross Blue Shield Claims Administrator (Notice@BCBSsettlement.com)
Subject: UPDATED Blue Cross Blue Shield Settlement Notice

Dear [Self-Funded Entity Account Class Member Name]:



SUPPLEMENTAL NOTICE

Additional Information for Self-Funded Accounts affected by the \$2.67 billion Blue Cross Blue Shield Settlement

Para una notificación en español, visite www.BCBSsettlement.com/espanol

A federal court authorized that this SUPPLEMENTAL NOTICE be sent to you.

Class Representatives ("Plaintiffs") and the Blue Cross Blue Shield Association ("BCBSA") and Settling Individual Blue Plans (together with BCBSA, "Settling Defendants") reached a settlement in a class action antitrust lawsuit called *In re: Blue Cross Blue Shield Antitrust Litigation MDL 2406*, N.D. Ala. Master File No. 2:13-cv-20000-RDP (the "Settlement").

This SUPPLEMENTAL NOTICE is to inform you that Blue Cross or Blue Shield Self-Funded Entity Accounts that choose to opt out of the Settlement Damages Class will not receive any individualized injunctive relief under the Settlement, but can seek individualized injunctive relief in their own lawsuit.

To determine if you qualify to request a Second Blue Bid under the Settlement, check your eligibility at [search field].

This Notice advises you that Self-Funded Entity Accounts have until **Month x, 2022 to opt out** from the Settlement Damages Class. Opting out means that you will not be able to receive monetary damages or individualized injunctive relief under the Settlement. If you opt out and previously filed a claim, your claim will be automatically withdrawn. If you opt out, you will maintain your right to sue or continue to sue Settling Defendants for monetary damages and individualized injunctive relief related to the claims in this case.

Who is affected?

You may be affected if you are a Self-Funded Entity Account that purchased or were enrolled in a Blue Cross and/or Blue Shield administrative services plan at any point in time between September 1, 2015 and October 16, 2020.

Self-Funded Entity Accounts encompass any account, employer, health benefit plan, ERISA plan, non-ERISA plan, or group that purchased, were covered by, participated in, or were enrolled in a Self-Funded Health Benefit Plan from September 1, 2015 through October 16, 2020. Self-Funded Entity Accounts **do not** include sponsors, administrators, fiduciaries, or members of a Self-Funded Account. A Self-Funded Health Benefit Plan is any Commercial Health Benefit Product other than Commercial Health Insurance, including administrative services only ("ASO") contracts or accounts, administrative services contracts or accounts ("ASC"), and jointly administered administrative services contracts or accounts ("JAA").

What are my options?

Stay in the Settlement Classes: If you stay in the Settlement Classes, you will be bound by the Settlement. The deadline to file a claim has already passed. If you already filed a valid and timely claim, you may receive a cash benefit. You may also check your eligibility to request a Second Blue Bid at [search field].

Opt Out or Exclude Yourself: If you opt out or exclude yourself from the Settlement Damages Class, you will not receive any monetary damages or individualized injunctive relief, including the right to request a Second Blue Bid, under the Settlement. You will keep your right to sue Settling Defendants for monetary damages and individualized injunctive relief related to the claims in this case. As a member of the Rule 23(b)(2) Injunctive Relief Class, you will still release all other claims for declaratory or indivisible injunctive relief that are released under the Settlement Agreement.

If you opt out and you previously filed a claim, your claim will automatically be withdrawn. If you previously opted out and you want to now remain in the Settlement Damages Class, you must withdraw your opt out request.

Object to Supplemental Notice and/or Supplemental Notice Plan: If you do not exclude yourself from the Settlement Damages Class, you may object to this Supplemental Notice and/or the Supplemental Notice Plan filed with the Court. Given all Class Members' prior opportunity to object, no other objections are permitted at this time.

How do I exclude myself from the Settlement Damages Class?

If you do not want to receive the monetary damages benefits or the individualized injunctive relief under the Settlement, or if you wish to pursue your own separate lawsuit against Settling Defendants for monetary damages or individualized injunctive relief, you must exclude yourself from the Settlement Damages Class. This requires submitting a

written request to the Claims Administrator stating your intent to exclude yourself from the Settlement Damages Class.

Your Exclusion Request must include the following: (a) the name of your business, address, and telephone; (b) a statement that your business wants to be excluded from the Settlement Damages Class in In re: Blue Cross Blue Shield Antitrust Litigation; and (c) your personal, physical signature (electronic signatures, including DocuSign, or PDF signatures are not permitted and will not be considered personal signatures). Requests signed solely by your lawyer are not valid.

You must mail or email your Exclusion Request, postmarked or received by **Month x, 202x**, to:

Blue Cross Blue Shield Antitrust Litigation
c/o JND Legal Administration – Exclusion Dpt.
PO Box 91393
Seattle, WA 98111
or info@BCBSsettlement.com

If you opt out of the Settlement Damages Class and you previously filed a claim, your claim will automatically be withdrawn.

What if I already filed an exclusion?

If you already opted out of the Settlement Damages Class and you want to remain opted out, you do not need to do anything at this time.

If you already opted out of the Settlement Damages Class, but you want to remain in the Settlement Damages Class, you must notify the Claims Administrator that you would like to withdraw your opt out request. To withdraw your opt out request please send a letter that includes the following: (a) the name of your business, address, and telephone; (b) a statement that you would like to withdraw your exclusion request from the Settlement Damages Class in In re: Blue Cross Blue Shield Antitrust Litigation; and (c) your personal, physical signature (electronic signatures, including DocuSign, or PDF signatures are not permitted and will not be considered personal signatures).

Your request to withdraw your opt out must be mailed or emailed so that it is postmarked or received by **Month x, 202x**, to:

Blue Cross Blue Shield Antitrust Litigation
c/o JND Legal Administration – Exclusion Dpt.
PO Box 91393
Seattle, WA 98111
or info@BCBSsettlement.com

How do I object to the Supplemental Notice and/or the Supplemental Notice Plan?

If you have not excluded yourself from the Settlement Damages Class, you may object to this Supplemental Notice and/or the Supplemental Notice Plan filed with the Court. Given all Class Members' prior opportunity to object, no other objections are permitted at this time.

To object, you must send a letter or other written statement saying that you object to the Supplemental Notice and/or the Supplemental Notice Plan in *In re: Blue Cross Blue Shield Antitrust Litigation* and the reasons why you object. Please include:

- The name of the Action – *In re: Blue Cross Blue Shield Antitrust Litigation*
- Description of your objections, including any applicable legal authority and any supporting evidence you wish the Court to consider;
- Your full name, address, email address, telephone number, and the plan name under which Blue Cross Blue Shield coverage was provided and dates of such coverage;
- The identity of all counsel who represent you, including former or current counsel who may be entitled to compensation for any reason related to the objection, along with a statement of the number of times in which that counsel has objected to a class action within five years preceding the submission of the objection, the caption of the case for each prior objection, and a copy of any relevant orders addressing the objection;
- Your (and your attorney's) signature on the written objection; and
- A declaration under penalty of perjury that the information provided is true and correct.

Do not send your written objection to the Court or the judge. Instead, mail the objection to the Claims Administrator with copies to Co-Lead Counsel and Counsel for Settling Defendants at the addresses listed below. Your objection must be mailed so that it is postmarked by **Month x, 202x**, to:

Claims Administrator:
Blue Cross Blue Shield
Settlement c/o JND Legal
Administration
PO Box 91393
Seattle, WA 98111
(888) 681-1142

Plaintiffs' Co-Lead Counsel:
BLUE CROSS BLUE SHIELD
SETTLEMENT
c/o MICHAEL D. HAUSFELD
HAUSFELD LLP
888 16th Street NW, Suite 300
Washington, DC 20006
(202) 849-4141
BCBSsettlement@hausfeld.com

Counsel for Settling Defendants:
DAN LAYTIN
KIRKLAND & ELLIS LLP
300 N. LaSalle St.
Chicago, IL 60657
(312) 862-4137
BCBSsettlement@kirkland.com

BLUE CROSS BLUE SHIELD
SETTLEMENT
c/o DAVID BOIES
BOIES SCHILLER FLEXNER LLP
333 Main Street
Armonk, NY 10504
(888) 698-8248
BCBS-Settlement@bsflp.com

■ ■ ■ Please Do Not Contact The Court Regarding This Notice. ■ ■ ■

Questions?



Visit www.BCBSsettlement.com, or email info@BCBSsettlement.com,



call (888) 681-1142, or



write *Blue Cross Blue Shield Settlement* c/o JND Legal Administration,
P.O. Box 91390, Seattle, WA 98111.

EXHIBIT D

LinkedIn ad

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Additional Information for Self-Funded Accounts >

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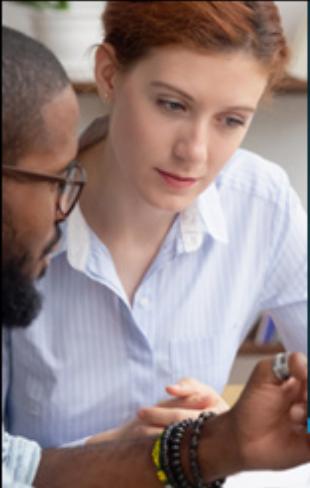
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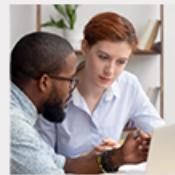
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SHRM HR Weekly e-Newsletter

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Blue Cross Blue Shield® Subscriber Settlement

Additional Information for Self-Funded Accounts affected by the
\$2.67 billion Blue Cross Blue Shield Settlement

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Employee Benefit News e-Newsletter

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Blue Cross Blue Shield® Subscriber Settlement

Additional Information for Self-Funded Accounts affected by the \$2.67 billion Blue Cross Blue Shield Settlement

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HREBenefits e-Newsletter



BLUE CROSS BLUE SHIELD® \$2.67 BILLION SETTLEMENT

Additional Information for Self-Funded Accounts

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Search ad

The image shows a Google search interface. At the top, the Google logo is visible. Below it is a search bar with a magnifying glass icon and a microphone icon for voice search. Underneath the search bar are navigation links for "ALL", "MAPS", "IMAGES", and "VIDEOS". A search result is displayed, starting with the text "Ad · www.bcbssettlement.com" followed by the headline "Blue Cross Blue Shield® | \$2.67 Billion Settlement". Below the headline is the subtext "Additional information for Self-Funded Accounts". To the right of the subtext is a small blue circular icon containing a white letter "i", likely indicating more information or a link.